

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA, MIAMI DIVISION**  
Case No. 1:23-md-03076-KMM

**IN RE:**

**FTX Cryptocurrency Exchange Collapse Litigation**

---

This Document Relates To:

*O'Keefe v. Sequoia Capital Operations, LLC, et al.*  
Case No. 23-cv-20700 (S.D. Fla.)

*O'Keefe v. Temasek Holdings (Private) Limited, et al.*  
No. 1:23-cv-23065 (S.D. Fla.)

*Chernyavsky, et al. v. Temasek Holdings (Private) Limited, et al.*  
Case No. 1:23-cv-22960 (S.D. Fla.)

*Cabo, et al. v. Temasek Holdings (Private) Limited, et al.*  
No. 1:23-cv-23212 (S.D. Fla.)

---

**DECLARATION OF MATTHEW GRAHAM IN SUPPORT OF  
DEFENDANT SINO GLOBAL CAPITAL HOLDINGS, LLC'S  
MOTIONS TO DISMISS**

I, MATTHEW GRAHAM, being over the age of 21, hereby declare as follows:

1. I am the managing member of Defendant Sino Global Capital Holdings, LLC ("SG Capital Holdings"), and an authorized representative of Defendant Sino Global Capital Limited ("Sino Global"). I have personal knowledge of all of the following facts and, if called as a witness, could and would competently testify thereto.

**Background and Ownership**

2. SG Capital Holdings is a limited liability company formed under the laws of Delaware. I personally own 100% of the membership interests in SG Capital Holdings.

3. Sino Global, an entity that has not been served in this action, is a venture capital firm headquartered in Hong Kong.

4. SG Capital Holdings is not a direct or indirect subsidiary of Sino Global. Plaintiffs' allegations that SG Capital Holdings is a wholly owned subsidiary of Sino Global are false.

5. Sino Global does not direct or otherwise control SG Capital Holdings' day-to-day operations or business decisions.

**SG Capital Holdings Did Not Invest In FTX**

6. SG Capital Holdings did not make any investment in FTX International, FTX US, or any other FTX-related entity. No SG Capital Holdings' employees were involved with researching, diligencing, negotiating, monitoring, or any other aspect of any investment into FTX in their capacity with SG Capital Holdings.

**SG Capital Holdings Lacks a Connection to California and Florida**

7. SG Capital Holdings is not incorporated, or registered to do business, in California.

8. SG Capital Holdings does not operate, conduct, engage in, or carry on a business or any business venture in California.

9. SG Capital Holdings does not maintain a place of business, office, facility, agency, or office in California, or otherwise have any physical operations in California.

10. SG Capital Holdings does not own, use, or possess real or personal property in California.

11. SG Capital Holdings does not maintain any bank accounts, post office boxes, or telephone numbers in California.


12. SG Capital Holdings maintains no books or records in California.

13. None of SG Capital Holdings' executives or directors is a resident of California.
14. SG Capital Holdings maintains no agent for service of process in California.
15. SG Capital Holdings has no connection with California arising from any action or conduct purposely directed towards California related in any way to any investments in FTX. No representative of SG Capital Holdings traveled to California for the purpose of engaging in business related to investments in FTX.
16. SG Capital Holdings does not regularly do or solicit business in California, or derive substantial revenue from goods used or consumed, or services rendered, in California.
17. SG Capital Holdings is not incorporated in Florida.
18. SG Capital Holdings does not own, use, or possess real or personal property in Florida.
19. SG Capital Holdings does not maintain any bank accounts, post office boxes, or telephone numbers in Florida.
20. SG Capital Holdings maintains no books or records in Florida.
21. None of SG Capital Holdings' executives or directors is a resident of Florida.
22. SG Capital Holdings maintains no agent for service of process in Florida.
23. SG Capital Holdings has no connection with Florida arising from any action or conduct purposely directed towards Florida related in any way to any investments in FTX. No representative of SG Capital Holdings traveled to Florida for the purpose of engaging in business related to any investments in FTX.
24. SG Capital Holdings does not regularly solicit business in Florida, or derive substantial revenue from goods used or consumed, or services rendered, in Florida.

DocuSign Envelope ID: D0A02649-A0F4-49D2-97EF-6BDC67980459

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September <sup>22</sup>\_\_\_\_, 2023.

  
By DocuSigned by: Matthew Graham  
0000E40099AE445F

Matthew Graham